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Counsel for Wayne Nugent, KGS Services, LLC and
Nugent Holdings, LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS**

In re	:	Chapter 11
SPHERATURE INVESTMENTS LLC., <i>et al.</i> , ¹	:	Case No. 20-42492
	:	Jointly Administered
Debtors.	:	

NOTICE OF DEPOSITION OF MICHAEL POATES

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, made applicable herein pursuant to Rules 9014(c) and 7030 of the Federal Rules of Bankruptcy Procedure, Wayne Nugent, KGS Services, LLC and Nugent Holdings LLC will take the deposition upon oral examination of Michael Poates, in his capacity as an officer for the above-captioned debtors.

¹ The “Debtors” in the above-captioned jointly administered chapter 11 bankruptcy cases (“Cases”) are: Spherature Investments LLC,; Rovia, LLC, WorldVentures Marketing Holdings, LLC, WorldVentures Marketplace, LLC, WorldVentures Marketing, LLC, WorldVentures Services, LLC.

PLEASE TAKE FURTHER NOTICE that the deposition shall begin on Monday, October 18, 2021, at 10 a.m. prevailing Central Time at the offices of Winstead PC, 2728 N. Harwood St., Ste. 500, Dallas TX 75201,² in connection with the Debtors' proposed Disclosure Statement and Fourth Amended Joint Chapter 11 Plan for Spherature Investments LLC and its Debtors Affiliates and Nugent's objection to same, which can be found at Dkt. No. 537. The deposition will be taken before a notary public or any other officer authorized to administer oaths and take testimony and will be recorded by stenographic means and will continue from day to day until completed. You are invited to attend and cross-examine the witness.

DATED: October 15, 2021
Dallas, Texas.

/s/ Ryan E. Manns
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and Nugent Holdings, LLC

² Mr. Poates is directed to appear at the officers of Winstead PC for the convenience of the parties and in the interest of efficiency, as Mr. Poates was previously directed to appear at the offices of Winstead PC at this date and time by Secreat Direct LLC [Dkt. No. 517]. To the extent the Secreat does not go forward with its scheduled deposition, Mr. Poates is directed to appear at the offices of Norton Rose Fulbright, US LLP, 2200 Ross Avenue Street, Suite 3600, Dallas, TX 75201.